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November 13, 2024

**Via ECF**

The Honorable Lorna G. Schofield  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re:

**Paradise Morgan v. Casa Del Sol Spirits Co.  
Case No. 24-cv-7534-LGS  
Motion to Adjourn Conference and Extend Deadline to file Documents**

Dear Judge Schofield:

The undersigned represents Paradise Morgan, the Plaintiff in the above-referenced case. On October 16, 2024, Your Honor issued an Order scheduling an Initial Conference for November 20, 2024 at 4:10 p.m. and directing the parties to file a joint letter and a joint Proposed Civil Case Management Plan and Scheduling Order ("CMP") by November 13, 2024.

Defendant was served on October 17, 2024 [See Docket #6]. Defendant's deadline to answer was November 7, 2024. As service was made through Defendant's registered agent, it is not unusual for Defendants to receive late notice of an action.

On November 11, 2024, I reached out to Defendant through its published email, [contact@casadelsolspirits.com](mailto:contact@casadelsolspirits.com), in an effort to ensure that it is aware of this action and the Order. I have not received a response yet. Consequently, I respectfully request that the November 20 Initial Conference be adjourned for 30 days in the hopes that Defendant may still appear. If Defendant continues to ignore this lawsuit by the adjourned date, I will seek a default judgment.

No prior request for this relief has been made.

Thank you for your consideration.

cc: Casa Del Sol Spirits Co. (via first-class mail and email)

Application **GRANTED**. The initial pretrial conference scheduled for November 20, 2024, is **ADJOURNED to December 18, 2024, at 4:10 P.M.** If Defendant has not appeared, Plaintiff shall file a status letter by **December 11, 2024**, (1) requesting further adjournment of the initial conference for up to 30 days and (2) proposing a date prior to the conference to present an Order to Show Cause for default judgment as to Defendant and related papers as provided in the Court's Individual Rules. The Clerk of Court is respectfully directed to close the motion at Dkt. No. 7.

Dated: November 15, 2024  
New York, New York



**LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE**

Respectfully submitted,

*/s/ Dan Shaked*  
Dan Shaked, Esq.